

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

MIKE YODER, DRONE DEER RECOVERY
MEDIA, INC., and JEREMY FUNKE,

No. 1:23-cv-00796

Plaintiffs,

HON. PAUL L. MALONEY

v.

SCOTT BOWEN, in his official capacity as
Director of the Michigan Department of
Natural Resources,

Defendant.

Donna G. Matias Cal. Bar No. 154268
Andrew Quinio Cal. Bar No. 288101
Attorneys for Plaintiffs
Pacific Legal Foundation
555 Capitol Mall, Suite 1290
Sacramento, CA 95814
(916) 419-7111
dmatias@pacificlegal.org
aquinio@pacificlegal.org

Nathan A. Gambill (P75506)
Echo Aloe (P86363)
Assistant Attorneys General
Attorneys for Defendant
Environment, Natural Resources,
and Agriculture Division
P.O. Box 30755
Lansing, MI 48909
(517) 335-7664
gambilln@michigan.gov
aloee1@michigan.gov

**DEFENDANT'S MOTION TO DISMISS UNDER
RULES 12(B)(1) AND 12(B)(6)**

For the reasons stated in the accompanying brief, Defendant moves the Court to dismiss Plaintiffs' complaint in its entirety. Plaintiffs oppose this motion and will file a response in accordance with the updated schedule the Court entered on January 26, 2024. (PageID.77.)

Respectfully submitted,

/s/ Nathan A. Gambill

Nathan A. Gambill (P75506)
Echo Aloe (P86363)
Assistant Attorneys General
Attorneys for Defendant
Environment, Natural Resources, and
Agriculture Division
P.O. Box 30755
Lansing, MI 48909
(517) 335-7664
gambilln@michigan.gov
aloee1@michigan.gov

Dated: February 15, 2024

LF: Yoder, Drone Deer Recovery (v DNR) WD/AG# 2023-0383182-A/Defendant's Brief in Support of Motion to Dismiss 2024-02-15